

**UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD**

WOLF CREEK NUCLEAR OPERATING
CORPORATION

Employer,

and

Case 14-RC-160836

UNITED GOVERNMENT SECURITY
OFFICERS OF AMERICA, INTERNATIONAL
UNION AND ITS LOCAL 252

Petitioner.

**MOTION REQUESTING PERMISSION
TO FILE AMICUS BRIEF**

COMES NOW, the International Brotherhood of Electrical Workers, Local 225 (hereinafter “Amicus”) by and through its undersigned counsel, William R. Lawrence, IV, and pursuant to 29 C.F.R. § 102.67(h), respectfully requests that the Board allow Amicus file an amicus brief in the above-referenced case. In support of its request, Amicus states as follows:

1. Amicus represents approximately 400 employees at the Employer’s facility which includes a number of employees who are in the training and instructor classification of the parties’ collective-bargaining agreement.

2. The Regional Director’s decision finding the Security Instructors to be managerial employees has the potential to directly affect a number of employees currently represented by Amicus at the Employer’s facility thereby causing Amicus to be an interested party upon which this decision may have a substantial impact.

3. Amicus, as an organization who currently represents employees that conduct training and instruction for employees at the Employer’s facility, has a unique perspective as to the work these employees do and whether or not such employees are aligned with management or are otherwise

managerial employees. This unique perspective is not able to be provided by the parties to this case and would be beneficial to the Board in rendering a decision in this case.

4. Amicus has reached out to the Employer and the Petitioner in the above-captioned case to determine if either party has any objections to its request. The Petitioner informed Amicus that it did not have any objections to this request. The Employer has not responded to Amicus's inquiry at the time of this filing.

5. Amicus is prepared to file its brief within any pre-determined briefing schedule and the granting of this request will not cause any unnecessary or undue delays and will not burden the parties to this case.

WHEREFORE, Amicus respectfully requests the Board grant its request and allow it to file an amicus brief in this case as it has a unique perspective that can only be provided by Amicus and that perspective will benefit the Board in reaching a decision in this case. Additionally, Amicus represents approximately 400 employees at the Employer's facility and this decision may have a substantial impact on those in classifications dealing with training and instruction. Amicus is prepared to move expeditiously to avoid any delay and at least one of the parties does not object to the granting of this request.

Respectfully Submitted,

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CERTIFICATE OF SERVICE

The foregoing, Motion Requesting Permission to File Amicus Brief, filed by IBEW 225 in Case No. 14-RC-160836 was served upon the Petitioner, the Employer and Region 14, Sub-Region 17 by electronic mail on February 9, 2016 to the following:

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